

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

HIGHER EDUCATION LOAN AUTHORITY OF THE STATE OF MISSOURI)	
)	
Plaintiff,)	No. 18-01758
)	
v.)	Judge Thomas C. Wheeler
)	
THE UNITED STATES OF AMERICA,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to the Rules of the U.S. Court of Federal Claims, Appendix C, Section III, Plaintiff Higher Education Loan Authority of the State of Missouri (“MOHELA”) respectfully requests leave to file its Memorandum of Points and Authorities in Support of Plaintiff’s Application for Temporary Restraining Order and Motion for Preliminary Injunctive Relief (the “Memorandum”) under seal.

Certain portions of the Memorandum reveal confidential and proprietary proposal information, as well as source selection information, related to the proposal submitted by MOHELA to the U.S. Department of Education in response to the Phase I Solicitation for the procurement of a Next Generation Financial Services Environment and regarding MOHELA’s subsequent protest at the U.S. Government Accountability Office (“GAO”). The GAO issued a protective order in that protest that is discussed in the Memorandum. Further, Plaintiff’s Memorandum is marked in such a way that confidential, proprietary and source selection information is indicated, and is accompanied by a redacted version that will be available to the public.

Wherefore, Plaintiff respectfully requests that the Court issue an order granting this motion.

Respectfully submitted,

s/Scott F. Lane

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Dated: November 16, 2018

CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2018, a copy of the foregoing document was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Scott F. Lane
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